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CHRISTOPHER J. MAJOR

Counsel for Robinson & Cole LLP, Defendant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re:	:	
	:	Chapter 7
THELEN LLP,	:	Case No. 09-15631 (ALG)
	:	
Debtor.	:	
-----X		
YANN GERON, as Chapter 7 Trustee of	:	
Thelen LLP,	:	
	:	
Plaintiff,	:	Adv. Pro. No. 11-02662 (ALG)
	:	
-against-	:	
	:	
ROBINSON & COLE LLP and PARTNER DOES,	:	
	:	
Defendants.	:	
-----X		

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE
TO BANKRUPTCY COURT**

RELIEF IS SOUGHT from a United States District Judge of the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and all prior pleadings and proceedings herein, Defendant Robinson & Cole LLP in the above-referenced adversary pleading will move the United States District Court for the Southern District of new York, at the United States Courthouse located at 500 Pearl Street, New York, New York, at such time as is designated by the Court, for an Order pursuant to 28 U.S.C. §

157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure withdrawing the reference of the above-referenced adversary proceeding to the United States Bankruptcy Court of the Southern District of New York.

Pursuant to Local Rule 5011-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, Defendant Robinson & Cole LLP submit this motion to the Clerk of the Court of the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 6.1(b) of the Local Rules of the Southern District of New York, any answering memoranda shall be served within fourteen (14) days after service of the moving papers, and reply memoranda shall be served within seven (7) days after service of the answering papers.

Dated: December 5, 2011
New York, New York

Respectfully submitted,

/s/ Christopher J. Major
MEISTER SEELIG & FEIN LLP
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused the above Notice of Motion to be filed with the Southern District of New York Bankruptcy Court and served on all counsel of record via the Court's ECF system:

Dated: December 5, 2011

/s/ Christopher J. Major
Christopher J. Major